

## **Exhibit 51**

Excerpts of deposition of Lucien Greaves  
(November 6, 2023)

**In the Matter Of:**

**SATANIC TEMPLE vs NEWSWEEK DIGITAL**

1:22-cv-01343-MKV

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**LUCIEN GREAVES**

*November 06, 2023*

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LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

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1                   UNITED STATES DISTRICT COURT  
2                   SOUTHERN DISTRICT OF NEW YORK  
3                   -----x

4                   THE SATANIC TEMPLE, INC.,

5                                                                          Plaintiff,

6                                                                          -against-

Case No.  
1:22-cv-01343-MKV

7                   NEWSWEEK DIGITAL, LLC,

8                                                                          Defendant.

9                   -----x  
10                                                                          November 6, 2023  
11                                                                                  9:32 a.m.

12                                                                                  Deposition of LUCIEN GREAVES, taken by  
13                                                                                  Defendant, held at 30 Rockefeller Plaza, New  
14                                                                                  York, New York, before Joseph R. Danyo, a  
15                                                                                  Shorthand Reporter and Notary Public within  
16                                                                                  and for the State of New York.

LUCIEN GREAVES  
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1  
2 APP E A R A N C E S :  
3

4 KEZHAYA LAW PLC  
5 Attorneys for Plaintiff and the Witness  
6 150 S. Fifth Street  
Suite 1850  
Minneapolis, Minnesota 55401

7 By: MATT KEZHAYA, ESQ.  
SONIA KEZHAYA, ESQ.  
8

9  
10 LAW OFFICES OF CAMERON STRACHER PLLC  
11 Attorneys for Defendant  
12 51 Astor Place  
9th Floor  
New York, New York 10003

13 By: CAMERON STRACHER, ESQ.  
SARA TESORIERO, ESQ. (Via Zoom)  
14

15  
16 Also Present:  
17

LAURA HENRIQUE, ESQ., Newsweek (Via Zoom)

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# LUCIEN GREAVES SATANIC TEMPLE vs NEWSWEEK DIGITAL

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1 Greaves  
2 contacted about her following the release of the  
3 documentary Hail Satan.

4 Q. Why is that?

5                   A.     Because the narrative arc of her  
6 removal from The Satanic Temple was a part of  
7 that. It was a part of that documentary.

Q. So she made statements in the documentary about her removal and --

10                   A. Well, she made public statements  
11 about her removal before the documentary came  
12 out. She wrote a Medium article, Medium is a  
13 website that people can dump their content on, so  
14 she wrote a Medium article listing these untrue  
15 claims regarding her departure.

16 Q. Do you know if you spoke to a  
17 journalist for the Washington Post about Jex?

18                   A. I couldn't say specifically that it  
19 was that I talked to somebody from the Washington  
20 Post about her.

21 Q. Do you recall how many journalists  
22 you spoke to about Jex?

23                   A.     No. It wasn't a primary question  
24 people had following Hail Satan, but following  
25 Hail Satan there were at times a lot of

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1 | Greaves

2 Q. Are you aware that Jex Blackmore said  
3 this in her Medium piece, and I quote, "While I  
4 was part of the organization, I witnessed male  
5 members of the organization exploit their  
6 position and influence inappropriately and  
7 disrespectfully towards women. I myself  
8 experienced harassment and abuse from members who  
9 have now left the organization."

12                   A. Well, yeah. I know she said that in  
13 her Medium piece, but I don't know what reality  
14 that's supposed to relate to. I don't know what  
15 instances she's claiming these happened, and  
16 further, like I said, at the point where we  
17 actually had an organizational structure, she  
18 essentially wasn't working with us anymore.

19 So the likelihood of those comments  
20 being true I think are pretty low. Even though  
21 you want to take those types of seriously, her  
22 history of deceptive answers as to her  
23 relationship with TST are enough to make me very  
24 skeptical.

Q. Are you aware of any claims of

## LUCIEN GREAVES SATANIC TEMPLE vs NEWSWEEK DIGITAL

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1 Greaves

2 | harassment or abuse made by Jex?

3 A. No, none.

4 Q. She says that, when she complained  
5 about it, she was asked to "let it all blow  
6 over." Are you aware of anyone that she spoke to  
7 about these claims?

8                   A.     No. I think she's, honestly I think  
9 she's lying about those things. I don't think  
10 there's any truth to it.

11 Q. What is the basis for saying that  
12 she's lying?

13                   A. Because I feel like, if she was going  
14 to talk to anybody, she would have talked to me.  
15 I mean, you know, not to keep hammering on it,  
16 but she really wasn't working with us, and, when  
17 she would come around, she would talk to me. She  
18 would speak directly with me, and when she had  
19 first started, we had so few people that she was  
20 only just kind of working with me anyway.

21 So for her to suddenly come back  
22 after a couple of years and say, oh, I made these  
23 complaints, but nobody listened, and for me to  
24 not actually know those complaints, I feel like  
25 I have no idea who else she would have talked to,

## LUCIEN GREAVES SATANIC TEMPLE vs NEWSWEEK DIGITAL

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1 | Greaves

2 | or after April of 2019?

3           A. You know, I don't. I'm pretty sure  
4 it was before April of 2019. I think it was, I  
5 think when it first was released in Sundance,  
6 there was snow in Utah where we were, and I think  
7 it was February.

8 Q. Okay. In the documentary Jex  
9 Blackmore is portrayed as threatening to kill the  
10 United States President at the time. Was that an  
11 accurate portrayal of something that happened?

12                   A. Yeah, and I don't think it was  
13 presented in any deceptive context. I think her  
14 words were very apparent in the footage that was  
15 shown, and you know, I don't see any way she can  
16 absolve herself of responsibility for those  
17 words.

18 Q. After that scene, there was a scene  
19 in which she received a phone call from you. Do  
20 you remember that scene?

21 A. I do.

Q. What was the nature of that call?

23                   A. To be honest, I can't be sure that  
24 that was actually footage of when I called her to  
25 tell her that she was kicked out of The Satanic

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1 Greaves  
2 Temple. Her being on the phone may have been  
3 staged for B roll, but in fact I did have a phone  
4 call with her after she was removed from her  
5 position from The Satanic Temple by unanimous  
6 vote from our national council at the time.

7 Q. I'm going to mark the Medium article  
8 that we've been addressing as Plaintiff's Exhibit  
9 2.

10 (Plaintiff's Exhibit 2, Medium  
11 article titled The Struggle for Justice Is  
12 Ongoing, was so marked for identification,  
13 as of this date.)

14 Q. Do you remember the time frame in  
15 which Jex Blackmore was involved with TST?

16                   A. Well, like I said, she started out  
17 with us very early on like 2014, and after like  
18 2015 she pretty much wasn't doing anything with  
19 us, and she only kind of tried to revive her role  
20 I think in response to the fact that a  
21 documentary was being made, and she wanted to do  
22 what she could to maximize her own exposure  
23 utilizing the documentary, and towards that end  
24 she put together the event in which she claimed  
25 that some "we" were going to assassinate the

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1 Greaves

2 | President.

She put together this event without our knowing it, and this was after having performed other events without telling us about them, events that could directly impact our reputation and public image, she put together events like that previously, and then after the call for presidential assassination that is when it was unanimously mandated that she needed to be removed.

12 Q. Do you remember when the filming of  
13 Hail Satan began?

14 A. I believe filming for Hail Satan must  
15 have began around 2016.

16 Q. Was Jex Blackmore aware prior to  
17 filming of the notion of a documentary being  
18 filmed?

19                   A. I'm not sure when she became aware of  
20 a documentary being filmed, but I'm convinced  
21 that the documentary being filmed is what made  
22 her come back to identifying with us at all when  
23 holding events.

24 Q. Okay. Drawing your attention now to  
25 Plaintiff's Exhibit 2, I note the first sentence

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1 Greaves  
2 that they would be, but the rationale should be  
3 there as well.

4 Q. Was there any investigation into  
5 claims that Jex had been sexually harassed?

6           A. Not that I'm aware of, but I'm also  
7 not aware that she ever actually made a complaint  
8 or gave us anything to actually investigate.

9                   Q.     After the Medium article came out,  
10                  were there any investigations into her claims  
11                  that she had been sexually harassed?

12                   A. Well, I take issue with the idea that  
13 she made an actual claim within the Medium  
14 article. She made a statement claiming that  
15 there were these circumstances giving very little  
16 to work off and also under circumstances where we  
17 knew that she had been lying about essentially  
18 everything else in the Medium article, that I  
19 don't think we viewed these claims of hers as  
20 actionable on our end.

21 Q. So the answer is no, there was no  
22 investigation after the Medium article came  
23 out?

24                   A. Not that I'm aware of, but nor do I  
25 know what form that could take with such little

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1 Greaves  
2 information.

3 MR. STRACHER: Okay. No further  
4 questions.

5 MR. KEZHAYA: No further questions of  
6 mine.

7 | (Time noted: 11:30 a.m.)

10 Subscribed and sworn to  
11 before me this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

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2                   C E R T I F I C A T I O N  
3

4                   I, JOSEPH R. DANYO, a Shorthand Reporter  
5 and Notary Public, within and for the State of New  
6 York, do hereby certify:

7                   That I reported the proceedings in the  
8 within entitled matter, and that the within transcript  
9 is a true record of such proceedings.

10                  I further certify that I am not related, by  
11 blood or marriage, to any of the parties in this  
12 matter and that I am in no way interested in the  
13 outcome of this matter.

14                  IN WITNESS WHEREOF, I have hereunto set my  
15 hand this 12th day of November, 2023.

16                  \_\_\_\_\_  
17                  *Joseph R. Danyo*

18                  JOSEPH R. DANYO

19                  STATE OF NEW YORK

20                  My Commission Expires 2/20/2027

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I N D E X

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Witness	Page
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E X H I B I T S

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Defendant's/Plaintiff's	Page
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Exhibit 25 Document Bates stamped TST 37, TST 38, TST 39, TST 40 and TST 44	30
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Exhibit 26 Document Bates stamped TST 41, TST 42, TST 43 and TST 45	30
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Exhibit 27 Invoice dated 6/15/22 from Levick Strategic Communications, LP	56
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Exhibit 28 Document Bates stamped TST 36	56
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Exhibit 2 Medium article titled The Struggle for Justice Is Ongoing	67
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2 DEPOSITION ERRATA SHEET

3

Our Assignment No. 10478372

4

Case Caption: The Satanic Temple v Newsweek Digital

5

6 DECLARATION UNDER PENALTY OF PERJURY

7

I declare under penalty of perjury that I have  
read the entire transcript of my deposition taken in  
the above-captioned matter or the same has been read  
to me, and the same is true and accurate, save and  
except for changes and/or corrections, if any, as  
indicated by me on the DEPOSITION ERRATA SHEET  
hereof, with the understanding that I offer these  
changes as if still under oath.

14

Signed on the \_\_\_\_\_ day of \_\_\_\_\_

15

2023.

\_\_\_\_\_

17 LUCIEN GREAVES

18

19 Subscribed and sworn to on the \_\_\_\_\_ day of  
20 \_\_\_\_\_, 2023 before me.  
21  
22 \_\_\_\_\_

23 Notary Public in and for the State of New York.  
24  
25